

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

BIG LOTS, INC., *et al.*,  
  
Debtors.

Chapter 11

Case No. 24-11967 (JKS)  
(Jointly Administered)

Related to Dkt. No. 576

**LIMITED OPPOSITION AND NOTICE OF RESERVATION OF RIGHTS**

Talenfeld Properties L.P., (“Talenfeld” or “Lessor”) who leased property located in Moses Lake, Washington to PNS Stores, Inc., a California corporation, doing business as Big Lots, files this limited opposition and notice of reservation of rights (“Reservation of Rights”) to the Final Order (I) authorizing Debtors to assume the consulting agreement, (II) authorizing store closing sales and approving related procedures, and (III) granting related relief.

**RESERVATION OF RIGHTS**

Talenfeld does not object to the debtors' exercise of their business judgment regarding whether to remain in possession of the premises pursuant to the lease; however, Talenfeld reserves all rights and remedies available under the Bankruptcy Code for the benefit of Talenfeld as a lessor, including, without limitation, the right to require that any assumption and assignment of our lease be conditional upon the cure of all existing defaults under the lease, and adequate assurances of future performance by any assignee.

For the avoidance of doubt, Talenfeld is not hereby agreeing to or approving any assumption or assignment of its lease and instead is reserving any and all rights that may be available under applicable law regarding same.

Dated: November 22, 2024

Respectfully submitted,

CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

By: /s/ Jerrold L. Bregman  
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